

April 17, 2020

**BY ECF AND EMAIL**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *Ruzhinskaya v. Healthport Technologies, LLC and Beth Israel Medical Center*  
Case No. 1:14-cv-02921 (PAE) (GWG)**

Dear Judge Engelmayer:

We represent Defendant Beth Israel Medical Center ("Beth Israel") in the above matter. Pursuant to Section 4(B) of Your Honor's Individual Rules and Practices in Civil Cases, I am writing to request permission to file the Joint Statement of Undisputed Facts with redactions. The redactions are the same as the Court previously granted for the Joint Statement of Undisputed Facts. (Dkt. 321). Plaintiff consents to this request.

By email to Your Honor's chambers, I am attaching an unredacted copy of the Joint Statement with the proposed redactions highlighted in yellow. In the event that the court approves the redactions, Beth Israel requests that the unredacted version of this document be filed and maintained under seal, in accordance with sections 4(B) and 6(B) of Your Honor's Individual Rules and Practices.

Beth Israel makes this request pursuant to the Protective Order in this case (Dkt. #54). Specifically, the Joint Statement contains material designated as "Confidential." Paragraph 8 of the Protective Order provides in relevant part that "[a]ll Confidential material or testimony filed with the Court, and all portions of pleadings, motions, or other papers filed with the Court that disclosed Confidential material or testimony, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court."

In this regard, Beth Israel seeks permission to redact references to certain confidential contents in the publicly filed version of the Joint Statement of Undisputed Facts, which conform with previously granted redactions (Dkt. 321).

Unredacted copies of the entirety of Beth Israel's filing have been served on counsel for all other parties. Accordingly, Beth Israel asks that the Court deem these papers timely filed.

We appreciate Your Honor's attention to this matter.

Respectfully,

*/s/ Sandra D. Hauser*

Sandra D. Hauser

cc: All counsel via ECF

4/17/2020

The Court has reviewed and approves of the proposed redaction.

SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge